

LEVIN SIMES LLP
1700 Montgomery Street, Suite 250
San Francisco, California 94111
415.426.3000 phone • 415.426.3001 fax

William A. Levin (SBN 98592)
Laurel L. Simes (SBN 134637)
David M. Grimes (SBN 324292)
Samira J. Bokaie (SBN 332782)
LEVIN SIMES LLP
1700 Montgomery Street, Suite 250
San Francisco, California 94111
Telephone: (415) 426-3000
Facsimile: (415) 426-3001
Email: wlevin@levinsimes.com
Email: lsimes@levinsimes.com
Email: dgrimes@levinsimes.com
Email: sbokaie@levinsimes.com

Attorneys for Levin Simes Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF WILLIAM A. LEVIN
IN RESPONSE TO DECLARATION OF
MICHAEL B. SHORTNACY
REGARDING PLAINTIFFS NOT IN
COMPLIANCE WITH THE COURT'S
MARCH 26, 2025 ORDER**

This Document Relates to:

*Jane Doe LS 293 v. Uber Technologies,
Inc., et al., No. 3:23-cv-04364-CRB*

*Jane Doe LS 231 v. Uber Technologies,
Inc., et al., No. 3:23-cv-04367-CRB*

*Jane Doe LS 144 v. Uber Technologies,
Inc., et al., No. 3:23-cv-04388-CRB*

*Jane Doe LS 112 v. Uber Technologies,
Inc., et al., No. 3:23-cv-05286-CRB*

*Jane Doe LS 284 v. Uber Technologies,
Inc., et al., No. 3:23-cv-05363-CRB*

*Jane Doe LS 126 v. Uber Technologies,
Inc., et al., No. 3:23-cv-05370-CRB*

*Jane Doe LS 265 v. Uber Technologies,
Inc., et al., No. 3:23-cv-05377-CRB*

LEVIN SIMES LLP
 1700 Montgomery Street, Suite 250
 San Francisco, California 94111
 415.426.3000 phone • 415.426.3001 fax

Jane Doe LS 200 v. Uber Technologies, Inc., et al., No. 3:23-cv-05387-CRB

Jane Doe LS 66 v. Uber Technologies, Inc., et al., No. 3:23-cv-05414-CRB

Jane Doe LS 317 v. Uber Technologies, Inc., et al., No. 3:23-cv-05424-CRB

Jane Doe LS 234 v. Uber Technologies, Inc., et al., No. 3:23-cv-05433-CRB

Jane Doe LS 191 v. Uber Technologies, Inc., et al., No. 3:23-cv-05573-CRB

Jane Doe LS 273 v. Uber Technologies, Inc., et al., No. 3:23-cv-05946-CRB

Jane Doe LS 470 v. Uber Technologies, Inc., et al., No. 3:24-cv-05207-CRB

Jane Doe LS 232 v. Uber Technologies, Inc., et al., No. 3:24-cv-05327-CRB

Jane Doe LS 373 v. Uber Technologies, Inc., et al., No. 3:24-cv-05328-CRB

Jane Doe LS 462 v. Uber Technologies, Inc., et al., No. 3:24-cv-05329-CRB

Jane Doe LS 226 v. Uber Technologies, Inc., et al., No. 3:24-cv-05330-CRB

Jane Doe LS 166 v. Uber Technologies, Inc., et al., No. 3:24-cv-05331-CRB

Jane Doe LS 122 v. Uber Technologies, Inc., et al., No. 3:24-cv-05332-CRB

Jane Doe LS 202 v. Uber Technologies, Inc., et al., No. 3:24-cv-05333-CRB

Jane Doe LS 416 v. Uber Technologies, Inc., et al., No. 3:24-cv-05335-CRB

Jane Doe LS 305 v. Uber Technologies, Inc., et al., No. 3:24-cv-05338-CRB

Jane Doe LS 201 v. Uber Technologies, Inc., et al., No. 3:24-cv-05354-CRB

Jane Doe LS 189 v. Uber Technologies, Inc., et al., No. 3:24-cv-05379-CRB

LEVIN SIMES LLP
 1700 Montgomery Street, Suite 250
 San Francisco, California 94111
 415.426.3000 phone • 415.426.3001 fax

Jane Doe LS 272 v. Uber Technologies, Inc., et al., No. 3:24-cv-05390-CRB

Jane Doe LS 199 v. Uber Technologies, Inc., et al., No. 3:24-cv-05402-CRB

Jane Doe LS 279 v. Uber Technologies, Inc., et al., No. 3:24-cv-05420-CRB

Jane Doe LS 139 v. Uber Technologies, Inc., et al., No. 3:24-cv-05527-CRB

Jane Doe LS 487 v. Uber Technologies, Inc., et al., No. 3:24-cv-05611-CRB

Jane Doe LS 141 v. Uber Technologies, Inc., et al., No. 3:24-cv-05634-CRB

Jane Doe LS 423 v. Uber Technologies, Inc., et al., No. 3:24-cv-05676-CRB

Jane Doe LS 491 v. Uber Technologies, Inc., et al., No. 3:24-cv-05678-CRB

Jane Doe LS 441 v. Uber Technologies, Inc., et al., No. 3:24-cv-05751-CRB

Jane Doe LS 518 v. Uber Technologies, Inc., et al., No. 3:24-cv-05761-CRB

Jane Doe LS 319 v. Uber Technologies, Inc., et al., No. 3:24-cv-05800-CRB

Jane Doe LS 484 v. Uber Technologies, Inc., et al., No. 3:24-cv-05824-CRB

John Doe LS 4 v. Uber Technologies, Inc., et al., No. 3:24-cv-05861-CRB

Jane Doe LS 368 v. Uber Technologies, Inc., et al., No. 3:24-cv-05898-CRB

Jane Doe LS 274 v. Uber Technologies, Inc., et al., No. 3:24-cv-05902-CRB

Jane Doe LS 359 v. Uber Technologies, Inc., et al., No. 3:24-cv-05908-CRB

Jane Doe LS 342 v. Uber Technologies, Inc., et al., No. 3:24-cv-05913-CRB

Jane Doe LS 304 v. Uber Technologies, Inc., et al., No. 3:24-cv-05914-CRB

LEVIN SIMES LLP
 1700 Montgomery Street, Suite 250
 San Francisco, California 94111
 415.426.3000 phone • 415.426.3001 fax

Jane Doe LS 369 v. Uber Technologies, Inc., et al., No. 3:24-cv-05915-CRB

Jane Doe LS 269 v. Uber Technologies, Inc., et al., No. 3:24-cv-05922-CRB

Jane Doe LS 93 v. Uber Technologies, Inc., et al., No. 3:24-cv-05925-CRB

Jane Doe LS 7 v. Uber Technologies, Inc., et al., No. 3:24-cv-05926-CRB

Jane Doe LS 504 v. Uber Technologies, Inc., et al., No. 3:24-cv-05928-CRB

Jane Doe LS 180 v. Uber Technologies, Inc., et al., No. 3:24-cv-05936-CRB

Jane Doe LS 119 v. Uber Technologies, Inc., et al., No. 3:24-cv-05937-CRB

Jane Doe LS 197 v. Uber Technologies, Inc., et al., No. 3:24-cv-06003-CRB

Jane Doe LS 314 v. Uber Technologies, Inc., et al., No. 3:24-cv-06016-CRB

Jane Doe LS 188 v. Uber Technologies, Inc., et al., No. 3:24-cv-06022-CRB

Jane Doe LS 230 v. Uber Technologies, Inc., et al., No. 3:24-cv-06026-CRB

Jane Doe LS 209 v. Uber Technologies, Inc., et al., No. 3:24-cv-06033-CRB

Jane Doe LS 532 v. Uber Technologies, Inc., et al., No. 3:24-cv-06927-CRB

Jane Doe LS 534 v. Uber Technologies, Inc., et al., No. 3:24-cv-07142-CRB

I, William A. Levin declare as follows:

1. I am an attorney who is duly licensed to practice law before all courts of the State of California. I am a partner the law firm Levin Simes LLP, and counsel of record for all Jane Doe LSA and Jane Doe LS Plaintiffs in MDL No. 3084. I make this declaration of my personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

2. On March 26, 2025, the Court ordered the above-captioned Plaintiffs to provide a complete and verified Plaintiff Fact Sheet within fourteen days of the Court's order.

3. On April 16, 2025, counsel for Uber submitted the Declaration of Michael B. Shortnacy which provided a list of Plaintiffs subject to Court's March 26, 2025 order who have not submitted a Plaintiff Fact Sheet.

4. The following Plaintiffs subject to the Court's order submitted their Plaintiff Fact Sheet on the following dates. As such, these Plaintiffs should not be dismissed.

- a) Jane Doe LS 232, submitted February 26, 2025
- b) Jane Doe LS 518, submitted February 21, 2025
- c) Jane Doe LS 532, submitted March 3, 2025
- d) Jane Doe 234, submitted March 28, 2025
- e) Jane Doe 305, submitted March 20, 2025
- f) Jane Doe LS 139, submitted March 20, 2025
- g) Jane Doe LS 368, submitted March 20, 2025
- h) Jane Doe LS 199, submitted April 9, 2025
- i) Jane Doe LS 342, submitted April 9, 2025
- j) Jane Doe LS 191, submitted April 11, 2025
- k) Jane Doe LS 269, submitted April 22, 2025

5. The following Plaintiffs should not be dismissed as they have not been able to complete their PFS due to incarceration:

- a) Jane Doe LS 293

b) Jane Doe LS 141

c) Jane Doe LS 504

d) Jane Doe LS 317

6. The following Plaintiffs are deceased:

a) Jane Doe LS 265

b) Jane Doe LS 304

c) Jane Doe LS 180

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 23, 2025, in San Francisco, California.

Respectfully Submitted,

LEVIN SIMES LLP

/s/ William A. Levin

William A. Levin

Attorney for Levin Simes Plaintiffs

LEVIN SIMES LLP
1700 Montgomery Street, Suite 250
San Francisco, California 94111
415.426.3000 phone • 415.426.3001 fax

CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

/s/ William A. Levin
William A. Levin

LEVIN SIMES LLP
1700 Montgomery Street, Suite 250
San Francisco, California 94111
415.426.3000 phone • 415.426.3001 fax